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UNITED STATES DIS	STRICT COURT	
NORTHERN DISTRICT OF CALIFORNIA		
JENNIFER CHANG, by and through her parents,) Case No.C06-02337 JSW	
NORMAN AND LINA CHANG,)	
Plaintiff,	 REQUEST, STIPULATION AND PROPOSED ORDER FOR EXTENDING TIME FOR BRIEFING MOTIONS AND 	
V.		
	CROSS-MOTIONS FOR SUMMARY	
CALIFORNIA SCHOOL FOR THE DEAF, CALIFORNIA DEPARTMENT OF EDUCATION,	JUDGMENT, RESPONSIVE PLEADINGS, AND HEARING THE MOTIONS	
and FREMONT UNIFIED SCHOOL DISTRICT,)	
Defendants.)	
Defendants.	ý (
	.)	
Counsel for plaintiffs, defendants, California Sc	chool for the Deaf and California Department of	
Education (State defendants), and Fremont Unified School District (FUSD) hereby stipulate and		
respectfully request that this court extend time for all pa	arties to file motions and cross-motions for	
summary judgment, and responsive pleadings. The rea	son for this request is that the parties have	
embarked on settlement negotiations, and progress has	been made. The next Settlement Conference	
with Magistrate Judge James will be held on May 30, 2	007. All counsel agree that this litigation	
would best be served if they could concentrate on trying	g to resolve this case by settlement agreement,	
rather than researching and drafting motions and cross-	motions for summary judgment. In addition, the	
Case No. C 06-02337 JSW 1	Request and Stipulation for Extension of Time	

ase No. C 06-02337 JSW	2 Request and Stipulation for Extension of Time Proposed Order
	Attorney for Plaintiffs
ated: May, 2007	WILLIAM KOSKI Youth and Education Law Project
	Attorneys for Defendants California Department of Education and California School for the Deaf, Fremont
rated: May <u>22</u> , 2007	REBECCA FREIE Deputy General Counsel
IT IS SO STIPULATED	
ollowing dates: August 15, 2007 and August 17,	2007.
he hearing date for these motions will also need	to be continued. All counsel are available on the
July 25: Plaintiffs' Reply in Support of Cro	ss Motion for Summary Judgment due.
Defendants' Reply in Support of Motions for Summary Judgment due.	
July 11: Defendants' Opposition to Plaintiffs Cross Motion for Summary Judgment and	
Cross Motion for Summary Judgn	nent Due.
June 27: Plaintiffs' Opposition to Defendar	nts Motions for Summary Judgment and Plaintiffs'
June 13: Defendants FUSD and CSD/CDE's Motions for Summary Judgment Due.	
imes, and order the following briefing schedule in lieu of that ordered on May 3, 2007:	
ommencing two weeks after the next Settlement	Conference on May 30, 2007 with Magistrate Judge
The parties respectfully request that the co	urt extend the current briefing schedule to dates
f these experts be available as they draft their res	pective motions.
	eement, parties desire that the deposition testimony
heduled for deposition after the current date for	the State defendants submitting their apening brief.
eposition priof to the clif-syf date 75-15 Wert these	ween trile of 15/2009,5/2019 from the specific f
kpert witness for the State defendants has been or	ut of the country, and will not be available for

expert witness for the State defendants has been out of the country, and will not be available for Case 3:06-cv-02337-JSW Document 77 Filed 05/24/07 Page 3 of 4 deposition prior to the cut-off date for expert discovery, June 1, 2007, and plaintiffs' expert has been Case 3:06-cv-02337-JSW Document 76 Filed 05/22/2007 Page 3 of 4 scheduled for deposition after the current date for the State defendants submitting their opening brief.

If this matter cannot be resolved by settlement agreement, parties desire that the deposition testimony of these experts be available as they draft their respective motions.

The parties respectfully request that the court extend the current briefing schedule to dates commencing two weeks after the next Settlement Conference on May 30, 2007 with Magistrate Judge James, and order the following briefing schedule in lieu of that ordered on May 3, 2007:

June 13: Defendants FUSD and CSD/CDE's Motions for Summary Judgment Due.

June 27: Plaintiffs' Opposition to Defendants Motions for Summary Judgment and Plaintiffs'

Cross Motion for Summary Judgment Due.

July 11: Defendants' Opposition to Plaintiffs Cross Motion for Summary Judgment and Defendants' Reply in Support of Motions for Summary Judgment due.

July 25: Plaintiffs' Reply in Support of Cross Motion for Summary Judgment due.

The hearing date for these motions will also need to be continued. All counsel are available on the following dates: August 15, 2007 and August 17, 2007.

IT IS SO STIPULATED

Dated: May , 2007

REBECCA FREIE
Deputy General Counsel

Attorneys for Defendants
California Department of Education and
California School for the Deaf, Fremont

Dated: May 22, 2007

William S. Kostilby NN

Youth and Education Law Project

Attorney for Plaintiffs

Case 3:06-cv-02337-JSW Document 77 Filed 05/24/07 Case 3:06-cv-02337-JSW Documer DONALD A. VELEZ Miller Brown Dannis Attorneys for Defendant Fremont Unified School District [PROPOSED] ORDER Good cause being shown, the following schedule for dispositive motions in this ma ordered: June 13: Defendants FUSD and CSD/CDE's Motions for Summary Judgment Due June 27: Plaintiffs' Opposition to Defendants' Motions for Summary Judgment ar Cross Motion for Summary Judgment Due July 11: Defendants' Opposition to Plaintiffs' Cross Motion for Summary Judgme Defendants' Reply in Support of Summary Judgment Motions Due July 25: Plaintiffs' Reply in Support of Cross Motion for Summary Judgment Due August 17, 2007 .m.: Hearing SO ORDERED. DATED: May 24, 2007 Request and Stipulation for E 3 Case No. C 06-02337 JSW Proposed Order